

Popenoe, Steve@Waterboards

From: Corene Rodder <crodder@somachlaw.com>
Sent: Thursday, August 07, 2014 4:40 PM
To: Popenoe, Steve@Waterboards
Cc: Creedon, Pamela@Waterboards; eofficer@cvcwa.org; Tess Dunham; Brittany Lewis-Roberts
Subject: CVCWA Comments re: Caruthers Community Service District
Attachments: 8-7-14 CVCWA Comment Letter on Caruthers CSD.pdf

Good Afternoon,

The attached comments are submitted for your consideration on behalf of the Central Valley Clean Water Association.

Sincerely,



Corene Rodder | *Legal Secretary*

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CVCWA Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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TONY PIRONDINI – Treasurer, City of Vacaville

August 7, 2014

Via Electronic Mail Only

Mr. Steven Popenoe
Water Resource Control Engineer
Regional Water Quality Control Board,
Central Valley Region
1685 "E" Street
Fresno, CA 93706
steve.popenoe@waterboards.ca.gov

RE: Comments on the Tentative Waste Discharge Requirements Order R5-2014-XXXX,
Caruthers Community Services District, Wastewater Treatment Facility, Fresno
County

Dear Mr. Popenoe:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements for the Caruthers Community Services District Wastewater Treatment Facility (Tentative Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide the following comments regarding Discharge Specification D.1 and the Salinity Management Plan requirement.

I. Discharge Specification D.2

The Tentative Order includes the following discharge specification: “No waste constituent shall be released, discharged, or placed where it will be released or discharged, in a concentration or in a mass that causes violation of Groundwater Limitations of this Order.”¹ This discharge specification is duplicative of the groundwater limitations contained in Section E.1 of the Tentative Order. The groundwater limitations are an independent requirement with which the Caruthers Community Services District (District) must comply. It is therefore unnecessary to include a separate discharge specification requiring compliance with these limitations.

Further, CVCWA is concerned with the reference to “mass” as part of this discharge specification. The groundwater limitations are concentration-based requirements that are consistent with adopted water quality objectives. Such objectives, or numeric criteria interpreting narrative objectives, are concentration-based objectives. Therefore, it is inappropriate to include reference to “mass” with respect to compliance with groundwater limitations. CVCWA respectfully requests that Discharge Specification D.2 be deleted.

II. Salinity Management Plan

The Tentative Order requires the District to submit a “Salinity Management Plan” within 360 days of adoption. The Plan must identify additional methods, if any, which could be used to further reduce the salinity of the discharge to the maximum extent feasible, and describe the tasks, costs, and time required to investigate and implement various elements.² The District must then implement the plan in accordance with a proposed schedule. CVCWA questions the usefulness of this study, given the quality of the effluent being discharged to land.

Based on the monitoring data provided in Table 2, the average electrical conductivity of the effluent was 469 µmhos/cm; the average TSS level was 7.4 mg/L; and the average nitrate (as N) concentration was 3.6 mg/L.³ The source water has extremely low levels of these constituents as demonstrated in the water supply monitoring results in Table 3. The Tentative Order recognized that “[i]n terms of salinity and nitrate, the water supply is excellent quality.”⁴ Moreover, existing monitoring data shows the discharge poses a minimal threat to groundwater with respect to the constituents associated with salinity. Comparing the effluent monitoring data to the groundwater monitoring data, the discharge should improve groundwater quality.

¹ Tentative Order, p. 13.

² Tentative Order, p. 18.

³ *Id.*, p. 3.

⁴ *Id.*, p. 5.

Given the high quality of the effluent and source water, very low threat of salinity impacts to the groundwater, and the relative small size of the discharge, a salinity plan is not justified. CVCWA respectfully requests that this requirement be removed.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or eoofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer